UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: DEC 9 1987

SUBJECT: Report on December 2, 1987 Meeting with BASF Corporation and the Michigan DNR

FROM: Bess Schenkier and Bob Newport R.G.N.
Assistant Regional Counsel Water Quality Branch

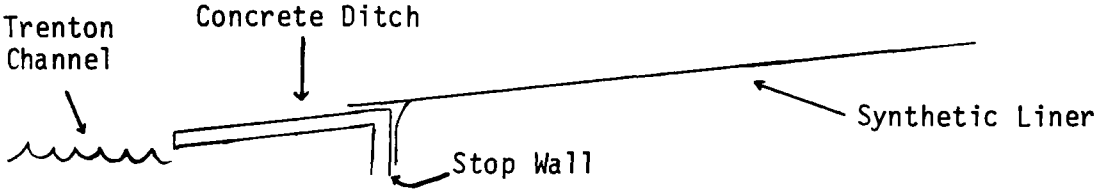
TO: File

We traveled to the Detroit metropolitan area on December 2, 1987 to meet with representatives of BASF Corporation and the Michigan DNR concerning BASF's landfill in Riverview, Michigan. The meeting was a follow-up to the Administrative Order issued by U.S. EPA in June 1987, which addressed pollutant discharges from the site to the Trenton Channel of the Detroit River.

BASF believes the most significant source of pollutants to the concrete-lined ditch (which drains most of the site) is groundwater seepage. This seepage comes through leaking seals in the ditch, and over the sides of the concrete liner. Some seepage was observed when we toured the site prior to our meeting. We have sample results showing the seep is contaminated with at least arsenic, copper, mercury, and zinc. We do not have sample results showing if the stormwater runoff from the site contains significant amounts of pollutants.

To address the seepage problem, BASF proposed to remove the concrete ditch, and replace it with a 45 mil. synthetic liner. Compacted sand would be used over and under the liner to protect it; about six inches of gravel would be laid over the top layer of sand. The new liner would be wider than the existing concrete ditch, to reduce the chances of seepage over the top. Attachment 2 of this report is a cross-section of the proposed changes to the ditch.

For stability, the concrete ditch will be left in place near the water's edge. The new liner will connect to the concrete something like this:



BASF believes this design will, for the most part, keep the groundwater on the site and prevent seepage to the main ditch. We responded to the proposal by saying, first of all, we would need to check back with appropriate people in Lansing and Chicago before we could fully endorse this change. Secondly, we indicated that even if we go ahead with this change, we would still like to see sampling data on:

a. Was the installation of the new liner successful at stopping seepage?

b. Is seepage a problem at the other two ditches?

c. Is stormwater runoff from the site contaminated?

We asked BASF if they would be willing to do studies on these issues. After a brief caucus, they responded that they would. We spoke for a while about how these concepts related to the entered consent decree covering the site (CA No. 80-73699), and tentatively determined these activities would have to be incoporated into a relatively minor amendment to the decree.

BASF would like to begin installation of the new liner in June 1988. In order to meet this date, we identified the following steps as being necessary:

Activity	Deadline
EPA and MDNR discuss BASF's proposal relative to the middle drainage ditch and determine if it has promise. The agencies then provide feedback on our decision back to BASF.	December 24, 1987
BASF begins work on construction drawings and procurement specifications.	January 15, 1988
BASF begins work on a plan of study for the sampling program.	January 15, 1988
BASF submits a formal proposal, including drawings, on the changes to the ditch.	February 15, 1988
BASF submits the proposed sampling plan for review.	February 15, 1988
EPA and DNR comments on the ditch design and sampling plan are discussed with the Corporation. BASF follows up with appropriate modifications.	March 15, 1988
Proposed changes to the site and the proposed sampling program are approved by EPA, MDNR, and the District Court.	April 1, 1988
BASF orders the new liner.	April 1, 1988
The new liner is delivered.	May 1, 1988
BASF begins installation of the new liner.	June 1, 1988

BASF estimates it will take 30-60 days to complete installation of the new liner. Testing of the ditch will begin soon after that, and continue at least until the following spring (when groundwater levels are high). The stormwater sampling and testing at the other ditches will probably also carry over into the spring of 1989. It is our expectation that BASF will be required to apply for a National Pollutant Discharge Elimination System permit if the sampling program shows significant concentrations of pollutants in the ditches (from either stormwater or seepage).

The approach described above is a good one only if we determine replacement of the concrete ditch is a good idea, one which will help to keep pollutants on the site and out of the Detroit River. We will need to consult with all the appropriate people in Region V very soon, and then probably have a short conference call with MDNR. We then need to provide some preliminary feedback to BASF on whether they should move ahead with this idea. A conference call with the State during the week of December 14 would be desirable, so we can get back to the Corporation by Christmas.

Attachments (2)

cc: Connie Puchalski
Bonnie Eleder
Bert Frey
Leon Acierto
Don Schregardus
Ken Fenner
Dale Bryson
Joan Arthur
Stewart Freeman (Michigan A.G.'s Office)
Roy Schrameck (MDNR - Northville)
Leonard Lipinski (MDNR)
Valerie Harris (MDNR)

Attachment 1

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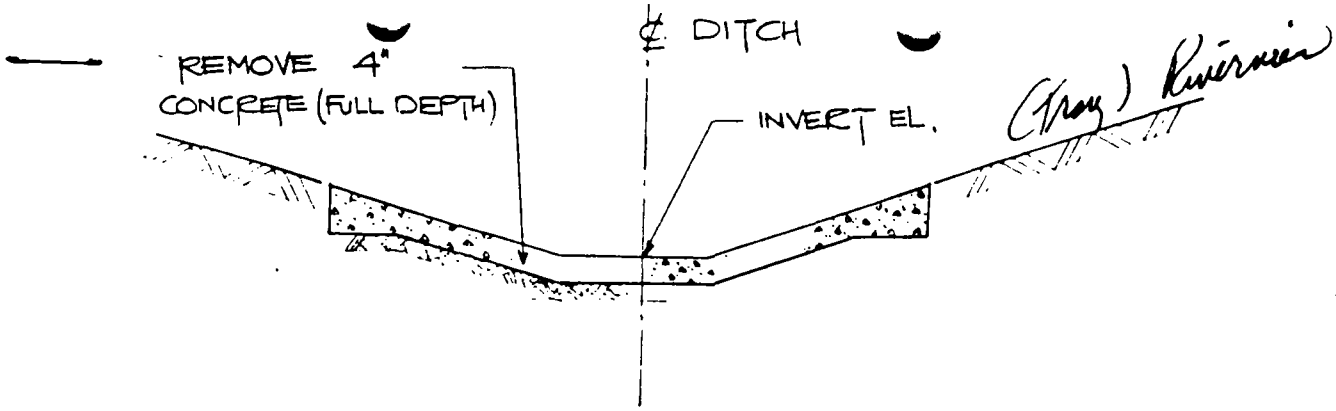
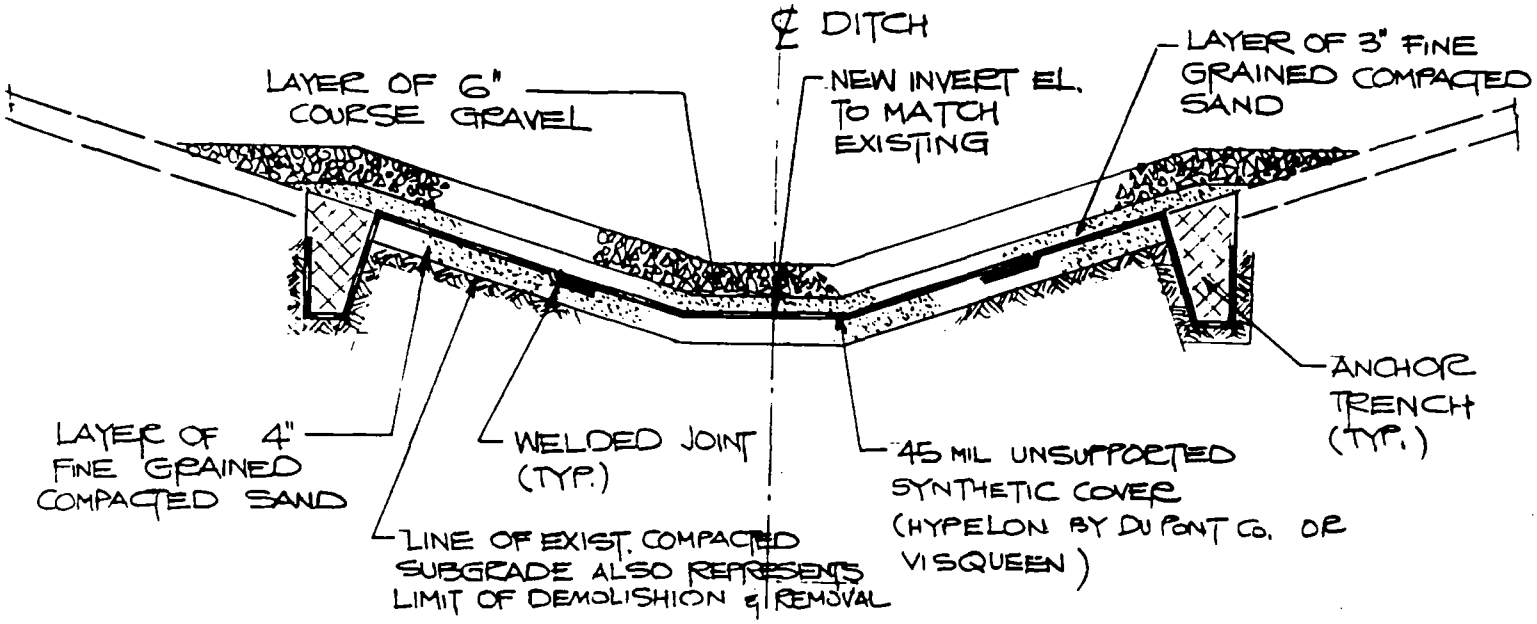
Dale Kast	BASF	Mgr. Env. Affairs	(313) 246-6106
Keith Fry	BASF	Parsippany	201-316-4601
Tom Hafs	BASF	Parsippany	201-397-2806
Bill Ayce	BASF	Wyandotte	313 246 616
Cathy Morse	M.D.N.R. - Surface Water Qual.		344-946
Ray Schumach	"	"	" "
Bob Newport	U.S. EPA,	Water Div.	(312) 886-6766

Attachment



EXISTING SECTION



PROPOSED REPAIR SECTION

TITLE:
RIVERVIEW SITE
PROPOSED REPAIR OF
DRAINAGE SYSTEM
EXIST. & PROPOSED REPAIR SECTIONS

LOCATION:
RIVERVIEW, MI SK-1R-1